

Statement of Work Focused Feasibility Study

Site: Woodbrook Road Dump Superfund Site, South Plainfield, Middlesex County, New Jersey

Site ID: NJSFN0204260

Purpose

This Interagency Agreement (IA) between the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA) is for OU1 focused feasibility study (FFS) activities at Woodbrook Road Dump (Woodbrook) Superfund Site (the Site).

Background

The Woodbrook Road Dump Site is an inactive, waste disposal area located on two properties in South Plainfield, Middlesex County, New Jersey and is zoned commercial/industrial. The properties cover approximately 70 acres of heavily wooded wetlands and uplands on undeveloped land in the vicinity of the Dismal Swamp. Dumps were operated on the two properties by previous owners during the 1940s and 1950s, accepting household and industrial wastes until shut down by the State of New Jersey in 1958. The current owner of the properties is Texas Eastern Terminal Company (TETC).

In September 1999, members of the non-profit organization, Edison Wetlands Association (EWA), discovered weathered electrical capacitors on the western portion of the Site. The capacitors were either on the ground surface or partially buried and some had the label, “Cornell Dubilier Inc”. In March 2000, TETC removed and disposed of 26 capacitors, with oversight by EPA. In August 2003, TETC entered into an administrative order on consent with EPA to further investigate and study the Site through an RI/FS and to implement additional Site security measures. The Site was placed on the NPL on April 30, 2003.

A contractor for TETC, TRC Environmental Corporation, initiated the RI in 2007. In 2009, a Community Advisory Group (CAG) was formed to keep the public apprised of activities at the Site. The RI found that PCB contamination was discovered in two dumping areas, the Eastern Dump and the Western Dump. All capacitors and capacitor parts are located throughout the Western Dump only. The capacitors and surrounding soils are considered “hot spots” with some concentrations indicative of pure PCB product. Levels of PCBs decrease in concentration as the distance from the capacitors increase.

The baseline human health risk assessment (BHRRA), performed by TETC, concluded that the following Site areas have risks exceeding EPA’s acceptable cancer or noncancer target levels for the recreational and trespasser receptors: the “hot spots” in Western Dumping Area; and the remaining areas of the Western Dumping Area with PCB contamination. The screening level ecological risk assessment (SLERA) found similar risk exceedances in the Western Dump, in addition to a few locations in the Eastern Dump. EPA has identified principal threat wastes at the Woodbrook Road Dump Site as soils and debris contaminated with elevated levels of PCBs greater than 100 parts per million (ppm). EPA has identified a site-specific remediation goal of 1 ppm for PCBs in soil.

The Record of Decision (ROD) was issued by EPA in September 2013 selecting a remedy consisting of excavation and off-site disposal of soil and debris contaminated with PCBs at concentrations greater

than 1 ppm. Since 2013, EPA has been negotiating with representatives of TETCO in an effort to reach agreement on implementation of the remedy.

In 2014, EPA initiated a remedial design including a large sampling investigation to further delineate the contaminated soil and debris at the site that exceed the remediation goal and estimate cut lines for the excavation of soil and debris. The design was completed in September 2017.

In 2018, EPA issued an Explanation of Significant Differences to document the basis for the revised cost estimate for implementation of the remedy.

In December 2020, EPA Region 2 received a request from the EPA Administrator and the Assistant Administrator for EPA's Office of Land and Emergency Management that EPA Region 2 to review, and, as appropriate, revise the 2013 ROD. The FFS will include a technical and scientific review of the bases for the 2013 remedy and the ESD. In addition, the FFS will identify and evaluate other remedial alternatives for remediation the site, as appropriate.

Work Statement

The USACE shall perform the FFS at the Woodbrook Road Dump Superfund Site. The FFS shall review the selected remedy, as well as identify, develop and evaluate other alternative to address Site contamination at the Woodbrook Road Dump Site. In addition, the previously performed risk assessment will be reviewed.

General Requirements

The USACE shall conduct the FFS in accordance with the *Guidance for Conducting RI/FS Studies under CERCLA* (USEPA, October 1988). The USACE shall also evaluate human health risk in accordance with EPA 540/1-89/002, as updated.

The USACE shall furnish all necessary and appropriate personnel, including materials, and services needed for, or incidental to, performing and completing the FFS.

The USACE shall manage all aspects of the work specified in this statement of work and be responsible for the selection, management, and oversight of all USACE contractor personnel who may be involved in the performance of this work.

Specific RI/FS Activities

The USACE will be responsible to conduct the FFS activities described below:

Task 1 – Project Planning

Upon receipt of this Scope of Work (SOW), the USACE shall identify activities necessary to perform the FFS. The USACE shall participate with EPA in one or more scoping meetings or conference calls to discuss the following items:

- The proposed scope of the project and the specific investigative and analytical activities that may be required to complete the FFS;
- Potential remedial alternatives for Site contamination;
- Assess compliance averaging of PCBs in soil;
- Potential applicable or relevant and appropriate requirements (ARARs) associated with the Site. Based on these discussions, the USACE shall conduct the work using, to the extent applicable, existing data collected at the Site;
- Assist the agency with the review of the BHHRA, including but not limited to:
 - Calculation of exposure point concentrations (EPCs) related to incorporation of new data, if appropriate
 - Calculation of cancer risk and non-cancer hazards, with documentation in standard RAGS Part D tables, using revised EPCs and/or exposure parameters
- Community involvement; and
- Land-use reassessment.

After the scoping meeting or conference call, the USACE shall develop the specific project plans to meet the objectives of the FFS. The project plans shall outline the technical approach, complete with corresponding personnel requirements, activity schedules, deliverable due dates, budget estimates for each of the specified tasks.

Task 2 – Technical Studies and Investigations

The USACE shall conduct investigations deemed necessary to prepare the FFS for the Site. Such investigations shall not duplicate work already performed at the Site. Instead, the studies and investigations will build on the existing database.

Task 3A – Work Plan Preparation

Subsequent to approval by EPA, the USACE shall provide EPA with a Work Plan for performance of the FFS. A Quality Assurance Project Plan developed in accordance with *Uniform Federal Policy for Quality Assurance Project Plans* (EPA-505-B-04-900A), should also be developed if the need for additional fieldwork is identified during the scoping meeting or conference call.

Task 3B – Baseline Human Health Risk Assessment

Assist the agency with the review of the BHHRA, including but not limited to:

- Calculation of exposure point concentrations (EPCs) related to incorporation of new data, if appropriate
- Calculation of cancer risk and non-cancer hazards, with documentation in standard RAGS Part D tables, using revised EPCs and/or exposure parameters

Task 4 – Work Plan Implementation

Upon EPA approval of the Work Plan, the USACE shall implement the Work Plan. The USACE shall submit the Work Plan and all other submittals in both hardcopy and electronic formats (e.g., Word text files and Excel spreadsheets), as specified by EPA.

Task 5 – Sample Analysis/Validation

Not applicable.

Task 6 – Data Evaluation

The USACE shall review all appropriate site documentation and data including the remedial investigation including data, feasibility study, Record of Decision, remedial design and any other appropriate documents.

Task 7 – Screening Level Ecological Risk Assessment Report

Assist the agency with the review of the SLERA if deemed necessary.

Task 8 – Remedial Alternatives Development and Screening

The USACE shall review the selected remedy and conduct remedial alternatives development activities in accordance with Section 4.2 of the *Guidance for Conducting RI/FS Studies under CERCLA*. The USACE shall perform alternative screening activities in accordance with Section 4.3 of the above referenced guidance. In addition to the previously determined alternatives, compliance average will be evaluated as a potential element of the FFS.

Task 9 – Detailed Analysis of Alternatives

Detailed analysis of alternatives will be conducted consistent with Chapter 6 of the *Guidance for Conducting RI/FS Studies under CERCLA*.

Task 10 – Focused Feasibility Study (FFS) Report

The USACE shall present Tasks 8 and 9 in an FFS report. Supporting data, information, and calculations will be included as appendices to the report. The USACE shall prepare and submit a draft FFS report under the *Guidance for Conducting RI/FS Studies under CERCLA* for comments and subsequently incorporate those comments into the final FFS report. A Site reuse evaluation will be included in the FFS report.

Task 10 – Post FFS Support

The USACE may be called upon to assist EPA by providing technical expertise in responding to oral and/or written public comment(s) on the FFS.

Other Requirements

The EPA RPM shall be notified at least sixty days in advance of reaching 75 and 100 percent expenditure of the total approved IA budget.

The USACE shall submit monthly progress reports in an electronic format to the EPA RPM and Project Officer, which summarize the following: key project milestones achieved; meeting summaries; activities and maintenance performed for the month; accomplishments; project goals, schedules and planned activities for the next three months; an identification of all delays encountered or anticipated that may affect the future schedule for performance of the FFS work, and all efforts made to mitigate delays or anticipated delays. A monthly cost report shall also be included.

The USACE shall use technologies and practices that are sustainable in accordance with EPA Region 2 Clean and Green policy (March 2009) or most current version found at <https://www.epa.gov/greenercleanups/regional-and-state-implementation-greener-cleanups>. At the direction of the EPA RPM or EPA Project Officer, the USACE shall incorporate requirements for the appropriate practices into the terms of its contracts consistent with the EPA Region 2 Clean and Green policy.

The USACE shall be responsible for maintaining all technical and financial records associated with this IA.

At the completion of this IA, the USACE shall perform all necessary closeout activities as specified in the IA. The closeout activities may include closing out any contracts, indexing and consolidating project records and files as required above and providing a technical and financial closeout report to EPA.

Project Organization

The EPA Remedial Project Manager for this project is:

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